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**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

MALIBU MEDIA, LLC,

Plaintiff,

v.

Civil Action No. 1:14-cv-00703

Judge Sharon Johnson Coleman

CARL GO,

Defendant.

/

**MOTION FOR ENTRY OF DEFAULT JUDGMENT  
AGAINST DEFENDANT CARL GO**

Plaintiff, Malibu Media, LLC (“Plaintiff”), by and through undersigned counsel, and pursuant to Fed.R. Civ.P. 55, hereby files its Motion for Entry of Default Judgment (“Motion”) against Defendant, Carl Go (“Defendant”), and in support thereof, states:

1. On January 30, 2014, Plaintiff filed its Complaint in this action.
2. On July 3, 2014, Plaintiff filed its First Amended Complaint.
3. Service of summons and Amended Complaint was obtained as follows:

**Defendant**

**Date of Service, Type of Service**

Carl Go

August 18, 2014, Substitute

4. Defendant has failed to plead or otherwise defend himself against Plaintiff’s Amended Complaint.

5. On October 7, 2014, Plaintiff filed and served a request that the Clerk of the Court enter Defendant’s default pursuant to Fed.R.Civ.P. 55(a).

6. Default was entered as to Defendant Carl Go on November 4, 2014.

7. Defendant is not a minor or an otherwise incompetent person. See Decl. of Mary K. Schulz, Esq.

8. This Motion is based on the allegations in Plaintiff's Amended Complaint. Defendant has admitted all of the facts alleged therein by failing to plead or otherwise respond to the Amended Complaint. See *Ortiz-Gonzalez v. Fonovisa*, 277 F3rd 59, 62-63 (1st Cir. 2002) ("A defaulting party is taken to have conceded the truth of the factual allegations in the complaint as establishing the grounds for liability as to which damages will be calculated.") (internal quotation marks and citation omitted).

9. This Motion is further based on the facts attested to in the Declaration of Mary K. Schulz, Esq. and the Memorandum of Points and Authorities in Support of Motion for Entry of Default Judgment filed contemporaneously herewith, and the record of the proceedings and papers on file herein. These materials are sufficient to justify the requested relief.

WHEREFORE, Plaintiff, Malibu Media, LLC, respectfully requests entry of a default judgment in favor of Plaintiff and against Defendant, Carl Go, in the form of the Proposed Default Judgment and Permanent Injunction attached hereto, and for such other and further relief this Court deems just and proper.

Dated: December 23, 2014

Respectfully submitted,

By: /s/ Mary K. Schulz  
Mary K. Schulz, 6183773  
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Schulz Law, P.C.  
1144 E. State Street, Suite A260  
Geneva, IL 60134  
Phone: 224.535.9510  
*Attorney for Plaintiff*

### **CERTIFICATE OF SERVICE**

I hereby certify that on December \_23\_\_\_\_, 2014, I electronically filed the foregoing document with the Clerk of the Court and all parties using the CM/ECF system. Participants in the case who are registered CM/ECF users will be served by the CM/ECF system.

I further certify that some of the participants in the case are not CM/ECF users. I have mailed the foregoing document via U.S. Mail (certified mail) to the persons set forth in the Service List below.

By: /s/ Mary K. Schulz  
Mary K. Schulz

#### **Service List**

Carl Go  
933 W. 34<sup>th</sup> Place  
Chicago, IL 60608